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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TASTY ONE, LLC d/b/a EARTH SMARTE WATER OF LAS VEGAS, Foreign Limited-Liability Company;

Plaintiff/Counter-Defendant,

vs.

EARTH SMARTE WATER, LLC d/b/a DENCOH20, LLC, an Arizona company; DOES I through X; and ROE CORPORATIONS I through X, inclusive,

Defendant/Counter-Claimant.

Case No.: 2:20-cv-01625-APG-NJK

STIPULATION TO EXTEND THE DEADLINE TO FILE REPLY TO RESPONSE TO DEFENDANT'S RENEWED MOTION TO DE-DESIGNATE DOCUMENTS DISCLOSED BY PLAINTIFF AND MARKED AS "HIGHLY CONFIDENTIAL-ATTORNEY'S EYES ONLY" PURSUANT TO PROTECTIVE ORDER AND FOR A DECLARATION THAT THE "HIGHLY CONFIDENTIAL-ATTORNEY'S EYES ONLY" DESIGNATION DOES NOT APPLY [ECF NO. 112]

(First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between the parties, Plaintiff Tasty One, LLC d/b/a Earth Smarte Water of Las Vegas ("Plaintiff"), by and through its attorneys of record, the law firm MAIER GUTIERREZ & ASSOCIATES and Defendant Earth Smarte Water, LLC d/b/a DENCOH20 ("Defendant"), by and through its attorney of record, John P. Aldrich, Esq., of the Aldrich Law firm, Ltd., as follows:

On February 3, 2023, Defendant filed its Renewed Motion to De-Designate Documents Disclosed by Plaintiff and Marked as "Highly Confidential-Attorney's Eyes Only" Pursuant to Protective Order and for a Declaration that the "Highly Confidential-Attorney's Eyes Only" Designation Does Not Apply [ECF No. 112] ("Renewed Motion to De-Designate Documents"). On February 17, 2023, Plaintiff filed its Response to Defendant's Renewed Motion to De-Designate

1 Documents [ECF No. 116]. The current deadline for Defendant to file its Reply in support of its
2 Renewed Motion to De-Designate Documents is February 24, 2023.

3 Because of extensive recent and existing commitments of Defendant's counsel, Defendant's
4 counsel requested and the parties have agreed to extend the time for Defendant to file its Reply in
5 support of its Renewed Motion to De-Designate Documents to March 3, 2023.

6 This stipulation is submitted in good faith and not for purposes of delay. It is the first request
7 for an extension of this deadline. The bench trial in this matter is currently scheduled on June 26,
8 2023. A settlement conference is currently scheduled in this matter on April 4, 2023. This stipulation
9 does not in any way interfere with or cause a delay in these existing deadlines.

10 IT IS SO STIPULATED.

11 DATED this 24th day of February, 2023.

12 MAIER GUTIERREZ & ASSOCIATES

13 /s/ Joseph A. Gutierrez

14 JOSEPH A. GUTIERREZ, Esq.
15 Nevada Bar No. 9046
16 JEAN-PAUL HENDRICKS, Esq.
17 Nevada Bar No. 10079
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Las Vegas, Nevada 89148
*Attorneys for Plaintiff/Counterdefendant Tasty
One, LLC d/b/a Earth Smarte Water of Las
Vegas*

DATED this 24th day of February, 2023.

ALDRICH LAW FIRM, LTD.

/s/ John P. Aldrich

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7866 W. Sahara Avenue
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*Attorneys for
Defendants/Counterclaimants/Third-Party
Plaintiffs Earth Smarte Water, LLC d/b/a
DENCOH20, LLC*

20 ORDER

21 IT IS SO ORDERED this 27th day of February, 2023.

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UNITED STATES MAGISTRATE JUDGE
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